

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

YINGLU YAO, Individually And On Behalf
Of All Others Similarly Situated,

Plaintiff,

vs.

FUWEI FILMS (HOLDINGS) CO., LTD.,
XIAOAN HE, JUN YIN, DUO WANG,
TONGJU ZHOU,

Defendants.

Case No. 07 Civ. 9416 (RJS)

MEIRA RUBIN, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

FUWEI FILMS (HOLDINGS) CO., LTD.,
XIAOAN HE, LIN TANG, MARK E.
STULGA, TONGJU ZHOU, DUO WANG,
JUN YIN, MAXIM GROUP LLC,
CHARDAN CAPITAL MARKETS, LLC, and
WR HAMBRECHT & CO. LLC,

Defendants.

Case No. 07 Civ. 10323 (RJS)

**DECLARATION OF DANIEL B. SCOTTI IN SUPPORT OF THE MOTION OF
SIAMAK NAZHAND FOR (1) APPOINTMENT AS LEAD PLAINTIFF; (2) APPROVAL
OF HIS SELECTION OF LEAD COUNSEL; AND (3) CONSOLIDATION OF ALL
RELATED ACTIONS**

I, Daniel B. Scotti, declare:

1. I am an attorney in the firm of Dreier LLP. I make this declaration in support of the motion of Siamak Nazhand (“Nazhand”) for: (1) appointment of Nazhand as Lead Plaintiff in the above-referenced actions; (2) approval of Nazhand’s selection of Dreier LLP as Lead Counsel; (3) consolidation of the above-captioned related actions; and (4) granting whatever further relief the Court may deem just and proper.

2. Attached hereto are true and correct copies of the following documents:

Exhibit A: Complaint filed in *Yao v. Fuwei*, No. 07 Civ. 9416;

Exhibit B: Sworn certification of Nazhand which demonstrates class standing and the requisite financial interest in the outcome of the litigation;

Exhibit C: Estimated losses for Nazhand;

Exhibit D: Notice published via Yahoo Finance on October 19, 2007; and

Exhibit E: The Firm Resume of Dreier LLP.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 18th day of December 2007 at New York, New York.

/s/ Daniel B. Scotti
Daniel B. Scotti

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing to be served on this 18th day of December by ECF notification on the following:

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